

# **EXHIBIT D**

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February 22, 2008

**VIA FACSIMILE**

Sarah Bouchard, Esq.  
Sarah Pontoski, Esq.  
Morgan Lewis  
1701 Market Street  
Philadelphia, PA 19103

Re: *Millan v. Citigroup, Inc.*  
07cv3769

Dear Counselors:

Following the completion of the depositions of your 30(b)(6) witnesses Thomas Saranello and Amadeo Discepolo, it is evident that there is a time period during which Mr. Millan worked for Citigroup Technologies, Inc. for which neither of the two witnesses can provide testimony.

From the testimony elicited, it seems that Paul Holden, Mr. Millan's manager at the time he assumed the position of Lab Coordinator at the 388 Greenwich St. facility would be the appropriate person to provide testimony with respect to Mr. Millan's job duties and responsibilities between December 2003 and May 2005.

If you are agreeable to produce Mr. Holden as a 30(b)(6) witness, please contact us to arrange a mutually agreeable date to proceed. If not, please so advise so that we can take this matter up with the Court.

Very truly yours,



Janet Walsh

Enclosure